

EXHIBIT I

Michael Gilman

From: Mike Gilman <mgilman@pgclawgroup.com>
Sent: Wednesday, December 09, 2015 10:04 AM
To: dbrezina@ladas.net
Cc: Iciar Narvaez
Subject: Peacock Feather Violation by Seventh Avenue - The Basu Group, Inc. - PGC Ref. 847-025
Attachments: US CPY Reg VA 1652678 - Peacock Feather #1.pdf; Seventh Avenue - Hand Painted Leather Peacock Bag.jpg
Importance: High

David,

It's been a while. I hope you are well and that you remember me. If you do not remember me, I am counsel for The Basu Group, Inc. and you and I were involved in a copyright litigation in the Southern District of New York involving your clients, Midnight Velvet, Inc. and Seventh Avenue, Inc., and their supplier at that time, Biacci Inc.

I am writing to you today, to inform you of a new allegation of copyright infringement by The Basu Group against your Seventh Avenue client. This new allegation involves one of the same copyrights our client asserted in the Biacci case, namely, US Copyright Reg. No. VA 1-652-678, entitled Peacock Feather #1. A copy of this registration is attached. The accused Seventh Avenue bag is seen on the attached image from your client's website, and is entitled "Hand-Painted Leather Peacock Bag," and appears to be item number "#D7724955".

We request the following:

- The name, address and contact information for Seventh Avenue's supplier(s) of the allegedly infringing bag;
- The total number of these allegedly infringing bags ordered by Seventh Avenue from these supplier(s), whether already delivered or pending delivery to Seventh Avenue;
- The number of these allegedly infringing bags sold by Seventh Avenue;
- The number of these allegedly infringing bags held in inventory by, or on behalf of, Seventh Avenue; and
- Copies of all purchase orders and invoices relating to these allegedly infringing bags.

I look forward to working with you to amicably resolve this matter.

Sincerely,

Michael R. Gilman | Partner
PERGAMENT & CEPEDA LLP

Main Contact Info.

163 Madison Ave., Suite 110
Morristown, NJ 07960
T: 973-998-7722
F: 973-998-7720
C: 201-522-9050

Secondary Contact Info.

315 Madison Ave., Ste 901
New York, NY 10017
(212) 807-4171 phone
(212) 957-1912 fax

Admitted NY & CT ONLY

mgilman@pgclawgroup.com
www.pgclawgroup.com

Certificate of Registration



This Certificate issued under the seal of the Copyright Office in accordance with title 17, *United States Code*, attests that registration has been made for the work identified below. The information on this certificate has been made a part of the Copyright Office records.

A handwritten signature in black ink that reads 'Marybeth Peters'.

Register of Copyrights, United States of America

Registration Number:

VA 1-652-678

Effective date of registration:

February 10, 2009

Title

Title of Work: Peacock Feather #1

Completion/ Publication

Year of Completion: 2007

Date of 1st Publication: January 1, 2008

Nation of 1st Publication: United States

Author

Author: The Basu Group Inc.

Author Created: 2-D artwork

Work made for hire: Yes

Domiciled in: United States

Author: Societe Maison De Cuir

Author Created: 2-D artwork

Work made for hire: Yes

Domiciled in: India

Author: Soumitra Roy

Author Created: 2-D artwork

Work made for hire: No

Domiciled in: India

Copyright claimant

Copyright Claimant: The Basu Group Inc.

2227 US Highway One, #162, North Brunswick, NJ, 08902, United States

Transfer Statement: By written agreement

Rights and Permissions

Organization Name: The Basu Group Inc.
Name: To whom it may concern
Address: 2227 US Highway One
#162
North Brunswick, NJ 08902 United States

Certification

Name: Michael R. Gilman
Date: February 6, 2009

Correspondence: Yes



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Hand-Painted Leather Peacock Bag
\$71.99

\$20.00 per month

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An accessory that adds instant wow to your look, this one-of-a-kind hand-painted bag is covered front and back with a fantasy representation of peacock feathers. Three compartments, 2 side pockets and 2 interior pockets make organization easy. Two zip closure compartments, one magnetic snap compartment. Adjustable shoulder strap. 10" l x 3 1/2" w x 7" h.

Hand-Painted Leather Peacock Bag #D7724955 \$71.99

Quantity: Ship to:

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